



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 9, 2016

BY ECF

The Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

**USDC SDNY
DOCUMENT
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Re: *United States v. Ross William Ulbricht, S1 14 Cr. 68 (KBF)*

Dear Judge Forrest:

In an abundance of caution, the Government respectfully writes to make a limited unsealing request in this case. The Government seeks to ensure that it may publicly respond in its brief on appeal to the defendant's arguments on appeal, without running afoul of prior sealing orders of the Court.

Specifically, the Government requests that the Court unseal seven sets of documents—five applications and orders authorizing pen registers and/or trap and trace devices, and two search warrants and associated applications (one to Facebook, and one to Google)—for the limited purpose of permitting the Government to respond on appeal. Each set of documents was sworn out and issued in this District by Magistrate Judges, and produced to the defense during discovery. *See* 13 Mag. 2228 (pen register/trap and trace order dated 9/16/2013, signed by Magistrate Judge Henry Pitman); 13 Mag. 2236 (pen register/trap and trace order dated 9/17/2013, signed by Magistrate Judge Henry Pitman); 13 Mag. 2258 (pen register/trap and trace order dated 9/19/2013, signed by Magistrate Judge Henry Pitman); 13 Mag. 2274 (pen register/trap and trace order dated 9/20/2013, signed by Magistrate Judge Debra Freeman); 13 Mag. 2275 (pen register/trap and trace order dated 9/20/2013, signed by Magistrate Judge Debra Freeman); 13 Mag. 2408 (Facebook search warrant dated 10/8/2013, signed by Magistrate Judge Gabriel W. Gorenstein); 13 Mag. 2409 (Google search warrant dated 10/8/2013, signed by Magistrate Judge Gabriel W. Gorenstein). The defense consents to the Government's request.

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The Court's consideration of this request is appreciated.

Respectfully submitted,

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*So ordered.
KBS.F
wsd*

6/9/16